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Proposed Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

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In re	:
CHINOS HOLDINGS, INC., et al.	:
Debtors.¹	:
	Chapter 11
	:
	Case No. 20-32181 (KLP)
	:
	(Jointly Administered)
	:
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**PROPOSED AGENDA FOR HEARING
ON MAY 26, 2020, AT 10:00 A.M. (PREVAILING EASTERN TIME)**

I. CONTESTED MATTER

1. “**365(d)(3) Motion**” – *Motion of Debtors for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Non-Residential Real Property Leases, and (II) Granting Related Relief* [ECF No. 23]

Related Documents:

- (a) *Declaration of Michael J. Nicholson in Support of Debtors’ Chapter 11 Petitions and First Day Relief* [ECF No. 6]

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are Chinos Holdings, Inc. (3834); Chinos Intermediate Holdings A, Inc. (3301); Chinos Intermediate, Inc. (3871); Chinos Intermediate Holdings B, Inc. (3244); J. Crew Group, Inc. (4486); J. Crew Operating Corp. (0930); Grace Holmes, Inc. (1409); H.F.D. No. 55, Inc. (9438); J. Crew Inc. (6360); J. Crew International, Inc. (2712); J. Crew Virginia, Inc. (5626); Madewell Inc. (8609); J. Crew Brand Holdings, LLC (7625); J. Crew Brand Intermediate, LLC (3860); J. Crew Brand, LLC (1647); J. Crew Brand Corp. (1616); J. Crew Domestic Brand, LLC (8962); and J. Crew International Brand, LLC (7471). The Debtors’ corporate headquarters and service address is 225 Liberty St., New York, NY 10281.

- (b) *Notice of Motion and Notice of Hearing* [ECF No. 137]
- (c) *Notice of Adjournment of Hearing on Motion of Debtors for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Non-Residential Real Property Leases, and (II) Granting Related Relief* [ECF No. 253]

Response Deadline: May 14, 2020.

Responses:

- (a) *Limited Objection of Simon Property Group, Inc. to Motion of Debtors for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Nonresidential Real Property Leases, and (II) Granting Related Relief* [ECF No. 49]
- (b) *Limited Objection of Bellevue Square, LLC and Bellevue Square Merchants' Association to Debtors' Motion for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Nonresidential Real Property Leases, and (II) Granting Related Relief* [ECF No. 184]
- (c) *Limited Objection and Joinder of 932 North Rush, L.L.C. to Motion of Debtors for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Nonresidential Real Property Leases, and (II) Granting Related Relief* [ECF No. 197]
- (d) *Bayer Retail Company IV, L.L.C. and Fritz Farm Retail Company LLC's Limited Objection to Debtors' Motion for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Non-Residential Real Property Leases, and (II) Granting Related Relief* [ECF No. 199]
- (e) *Limited Objection of the Grove, LLC, the Americana at Brand, LLC, and Palisades Village Co., LLC to Debtors' Motion for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Nonresidential Real Property Leases, and (II) Granting Related Relief* [ECF No. 200]
- (f) *Objection of BPP East Union LLC to Motion of Debtors for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Non-Residential Real Property Leases, and (II) Granting Related Relief* [ECF No. 201]
- (g) *Limited Objection of Factory Lessor LLC to Debtors' Motion for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Nonresidential Real Property Leases, and (II) Granting Related Relief* [ECF No. 202]

- (h) *Limited Objection of Mept Brewery Block 2 LLC to Motion for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Nonresidential Real Property Leases, and (II) Granting Related Relief [ECF No. 204]*
- (i) *Objection to Motion of Debtors for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Non-Residential Real Property Leases, and (II) Granting Related Relief [ECF No. 205]*
- (j) *Limited Objection of Grand Place LLC and STRS L3 ACQ1 LLC to Motion of Debtors for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Non-Residential Real Property Leases, and (II) Granting Related Relief [ECF No. 206]*
- (k) *Joinder of the Taubman Landlords to (a) the Limited Objection of Grand Place LLC and STRS L3 ACQ1 LLC to Motion of Debtors for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Non-Residential Real Property Leases, and (II) Granting Related Relief and to (b) Other Landlord Objections to the Motion [ECF No. 209]*
- (l) *Joinder of Washington Prime Group Inc. to Certain Objections to the Motion of Debtors for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Non-Residential Real Property Leases, and (II) Granting Related Relief [ECF No. 210]*
- (m) *Joinder of 1618 14th Street, NW, LLC to Certain Objections to Motion of Debtors for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Non-Residential Real Property Leases, and (II) Granting Related Relief [ECF No. 211]*
- (n) *Limited Objection and Joinder of Jenel Management Corp. in Limited Objections of Landlords to Motion of Debtors for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Nonresidential Real Property Leases, and (II) Granting Related Relief [ECF No. 212]*
- (o) *Limited Objection and Joinder of PSLP LLC and Pilaf Partners, LLC to the Debtors' Motion for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Nonresidential Real Property Leases, and (II) Granting Related Relief [ECF No. 213]*
- (p) *Limited Objection of CBL & Associates Management, Inc. and Joinder to the Limited Objections of Simon Property Group, Inc. to Motion of Debtors for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Nonresidential Real Property Leases, and (II) Granting Related Relief [ECF No. 226]*

- (q) *Joinder of the Simpson Organization, Inc. to the Limited Objection of CBL & Associates Management, Inc. and Joinder to the Limited Objection of Simon Property Group, Inc. to Motion of Debtors for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Nonresidential Real Property Leases, and (II) Granting Related Relief [ECF No. 227]*
- (r) *Limited Objection of 5616 Bay Street Investors, LLC, Brixmor Operating Partnership LP, CenterCal Properties, LLC, DDR Deer Park Town Center LLC, ERY Retail Podium LLC, EDENS, Federal Realty Investment Trust, PGIM Real Estate, Related Companies, Retail Properties of America, Inc., Starwood Retail Partners LLC, The Forbes Company, The Macerich Company, Trademark Property Company, and Urban Edge Properties L.P. to Motion of Debtors for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Nonresidential Real Property Leases, and (II) Granting Related Relief [ECF No. 228]*
- (s) *Joinder of Northwood PL A, L.P. to Objections to Debtors' Motion for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Nonresidential Real Property Leases, and (II) Granting Related Relief [ECF No. 230]*
- (t) *Joinder and Limited Objection of Eastview Mall, LLC and Pittsford Plaza SPE, LLC to Debtors' Motion for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Nonresidential Real Property Leases, and (II) Granting Related Relief [ECF No. 232]*
- (u) *Objection and Joinder of 91 Fifth Avenue Corp. with Respect to Debtors' Motion for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Nonresidential Real Property Leases, and (II) Granting Related Relief [ECF No. 234]*
- (v) *Joinder of Amerishop Suburban, L.P. to Objections to Debtors' Motion for Entry of Order Extending Time for Performance of Obligations Arising Under Unexpired Nonresidential Property Leases [EDF No. 235]*
- (w) *Limited Objection of Atlanta Outlet Shoppes, LLC, Bluegrass Outlet Shoppes CMBS, LLC, Westfield, LLC and Certain Affiliates to Motion of Debtors for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Non-Residential Real Property Leases, and (II) Granting Related Relief [ECF No. 242]*
- (x) *Limited Objection of Certain Landlords and Joinder to the Limited Objection of Grand Place LLC and STRS L3 ACQ1 LLC to Debtors' Extension Motion [ECF No. 243]*
- (y) *Objection and Response of Brookfield Property REIT Inc., Hines Global REIT, Jones Lang LaSalle Americas, Inc., Site Centers Corp., Tanger Outlet*

Centers, Inc., and Turnberry Associates (A) to Motion of Debtors for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Non-Residential Real Property Leases, and (II) Granting Related Relief, and (B) for Adequate Protection Under Sections 363(c) and 361 of the Bankruptcy Code [ECF No. 244]

- (z) *Amended Objection and Response of Brookfield Property REIT Inc., Hines Global REIT, Jones Lang LaSalle Americas, Inc., Site Centers Corp., Tanger Outlet Centers, Inc., and Turnberry Associates (A) to Motion of Debtors for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Non-Residential Real Property Leases, and (II) Granting Related Relief, and (B) for Adequate Protection Under Sections 363(c) and 361 of the Bankruptcy Code [ECF No. 245]*
- (aa) *The Official Committee of Unsecured Creditors' Objection to Motion of Debtors for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Non-Residential Real Property Leases, and (II) Granting Related Relief [ECF No. 246]*
- (bb) *Limited Objection by NorthPark Partners, LP to the Motion of Debtors for Entry of Order (I) Extending Time For Performance Of Obligations Arising Under Unexpired Nonresidential Real Property Leases, and (II) Granting Related Relief [Dkt. #23] and Joinder in Objections of The Official Committee of Unsecured Creditors and other Landlords [ECF No. 287]*
- (cc) *Joinder of the Preit Services, LLC, as Agent for Cherry Hill Center, LLC, PR Plymouth Meeting Limited Partnership, WG Park, L.P. and PR Woodland Limited Partnership, to (a) the Limited Objection of Grand Place LLC and STRS L3 ACQ1 LLC to Debtors' Motion for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Non-Residential Real Property Leases, and (II) Granting Related Relief and to (b) Other Landlord Objections to the Motion [ECF. No. 291]*

Status: This matter is going forward. The Debtors intend to file a reply in support of the 365(d)(3) Motion by no later than 12:00 p.m. (prevailing Eastern Time) on May 25, 2020, in accordance with the *Order Establishing Certain Notice, Case Management and Administrative Procedures* [Docket No. 109]. The Debtors also will submit a proposed order at the hearing to reflect informal comments received.

Dated: May 22, 2020
Richmond, Virginia

/s/ Nathan Kramer

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